

**INITIAL ENVIRONMENTAL EXAMINATION
&
REQUEST FOR CATEGORICAL EXCLUSION**

PROGRAM/ACTIVITY DATA:

Program/Activity Number: 690-0015
Country/Region: Regional Center for Southern Africa (RCSA)
Program/Activity Title: SO 15: Rural Livelihoods Diversified in Southern Africa (Rural Livelihoods Activity)

Funding Begin: FY04 **Funding End:** FY10 **LOP Amount:** \$ 58,148,793_____

Sub-Activity Amount: \$ _N/A_____

IEE Prepared By: Jeremy N. Burgess & Karen Menczer, Independent Consultants, and Jerry Brown, RCSA

Current Date: June 3, 2004

IEE Amendment (Y/N): _N_ If "yes", Filename & date of original IEE __n/a__

ENVIRONMENTAL ACTION RECOMMENDED: (Place X where applicable)

Categorical Exclusion: ☒ _X_ Negative Determination: ☒ _X_
Positive Determination: _____ Deferral: _____

ADDITIONAL ELEMENTS: (Place X where applicable)

CONDITIONS ☒ _X_ PVO/NGO: ☒ _X_

SUMMARY OF FINDINGS:

The Rural Livelihoods (RL) Activity under SO 15 is based on diversifying crops and livestock in order to increase the incomes of small-scale commercial farmers and resource poor farmers through increased production and sales of agricultural products. The RL Activity will support the Presidential Initiative to End Hunger in Africa (IEHA), promoting regional synergies and complementarities from effective coordination and monitoring of IEHA programs in Southern Africa.

The RL Activity comprises three components and 13 interventions. One additional intervention is included under the Program Support Objective (PSO). The components and interventions are summarized below with the recommended environmental threshold determinations for each component.

1. Component 1: Production Support Services. Interventions include (1) Economic Research & Policy Harmonization, (2) Biotechnology Research & Bio-safety Policy Advocacy, (3) Research & Technology Transfer, (4) Appropriate Germplasm, and (5) Information and Communication Technology (ICT) to support interventions 1-4. With the exceptions of (2) Biotechnology Research & Bio-safety Policy Advocacy, (3) Research & Technology Transfer, and aspects of (4) Appropriate Germplasm, the illustrative interventions included in Component 1 will not directly affect the environment and can be categorically excluded from additional environmental review on the basis of the following:

- a. **Categorical exclusions** are recommended for (a) education, technical assistance, training (216.2(c)(2)(i)), (b) analyses, studies, and workshops (216.2(c)(2)(iii)), (c) information transfers (216.2(c)(2)(v)), as well as (d) studies, projects or programs intended to develop the capability of recipient countries and organizations to engage in development planning (22 CFR 216.2(c)(2)(xiv)).

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b. Negative threshold determinations with conditions, per 22 CFR 216.3(a)(2)(iii), are recommended for interventions (2) Biotechnology Research & Bio-safety Policy Advocacy, (3) Research & Technology Transfer, and (4) Appropriate Germplasm. The conditions are laid out below.

(i) For Intervention (2), Biotechnology Research and Bio-safety Policy Advocacy, the **conditions** are that no biotechnology testing or release of any kind can take place until the host country (countries) has (have) drafted and approved a regulatory framework governing biotechnology and bio-safety. This intervention includes assistance in the development of regulations on the testing and use of GMOs. Illustrative interventions will mainly involve technical assistance, training and workshops, and studies and analyses. Any controlled experimentation for the purpose of research and field evaluation would be conducted in South Africa, which is the only country in the region that has an approved regulatory framework governing biotechnology and bio-safety. In addition, interventions that involve biotechnologies shall conform to the USAID ADS 211 - *Biosafety Procedures for Genetic Engineering Research* (in draft as of mid-2004), which describes the required written approval procedures needed before transferring or releasing GE products to the field. The USAID Biosafety “first review and reporting requirements” are summarized below in [Sect. 4.3](#).

(ii) For Intervention (3), Research & Technology Transfer, **conditions** apply because this intervention may include the following types of activities that could warrant additional environmental review:

Assistance in Procuring or Using Fertilizers with the condition that this support is confined to “small-scale” and is located where threatened or endangered species or their habitat, and other sensitive habitats, including protected areas and wetlands, will not be adversely impacted. In addition, this negative threshold decision is recommended based on the understanding that assistance in the use of fertilizers will not include support for the procurement of “quantity imports” of fertilizers. The implementing partner should seek guidance on small-scale and quantity imports. More detail is provided in Sect. 4.2.

Assistance in Procuring or Using Pesticides, including their procurement, use, transport, storage or disposal, shall occur only under the following conditions:

- Any pesticide activity considered under this program would necessitate the preparation and approval of a Pesticide Evaluation Report and Safer Use Action Plan (PERSUAP), in accordance with AFR Bureau guidance and fulfilling all analytical elements required by 22CFR216.3(b), USAID’s Pesticide Procedures.
- Any assistance shall be limited to “small-scale” use and to pesticides registered with the USEPA for the same or similar uses without restriction.
- An amended IEE must be submitted to and approved by the Africa Bureau Environmental Officer prior to using or procuring pesticides (including TA and training in pesticide use and management).

Diversification of Crop-Livestock Systems with the condition that livestock systems be limited to the care, management and breeding of small ruminants and poultry and that this intervention only take place at very low densities in rural areas. Animal populations per household should be insignificant in terms of density and possible issues with nitrate pollution from livestock. In addition, steps should be taken to ensure that land unsuitable for agriculture (forest, wetland, and other sensitive habitats) shall not be cleared to support crop or livestock diversification. See Section 4.2 for details.

Assistance in Constructing and Managing Irrigation Systems. While 22 CFR 216 does not provide guidance regarding what is considered small versus large-scale, an Environmental Review Report (ERR) [see Environmental Guidelines for Small-Scale Activities in Africa (EGSSAA), Part III (www.encapafrica/SmallScaleGuidelines/)] will be required at a site and activity-specific level that describes the intervention, potential environmental consequences, and recommends mitigation measures. At the discretion of the REA/MEO, a determination will be made of the scale of the intervention and the

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range and significance of impacts and, based on this analysis, whether additional environmental review will be necessary.

(iii) Intervention (4), Appropriate Germplasm:

Seed Sector Development, R&D to Identify Genetic Material. SME food processors, traders and exporters, supported research institutions, NGOs and suppliers shall 1) ensure appropriateness for the agroclimatic zone to which they are being introduced, 2) avoid providing or promoting genetically modified organisms (GMOs), 3) avoid introducing exotic invasive species, and 4) avoid introduction of non-native plants into protected areas.

This requires identifying and mitigating any potential direct adverse impacts on the physical environment and human health and safety (such as those due to aflatoxin contamination) arising from distribution of free seeds.

Food Processing of Raw Agricultural Products. Food manufacturers must use plant varieties that maximize processing efficiency and take measures as appropriate to ensure process efficiencies and cleaner production technologies and pollution prevention. It is recommended that for all activities relating to the expansion of microfinance and/or micro enterprise to be subjected to environmental review. The **ERR form** in the EGSSAA can be tailored as needed, to assist in identifying potential environmental impacts that are likely to occur as a result of such micro enterprise activities. The ERR helps to classify such potential impacts into low risk medium risk and high risk categories. Mitigation measures must be identified for all medium and high risk categories. Again, see the EGSSAA Part III, “Guidelines for Micro and Small Enterprises.” In addition, the SO team leader shall visit all such projects during implementation to ensure that they are not likely to cause any adverse environmental impacts, with a view to correcting and or initiating additional mitigation measures.

An environmental management course entitled “Improving Micro- and Small Enterprise Success through Cleaner Production” is recommended for SO 15 partners. See <http://www.encapafrika.org/coursepage.htm>. This provides an opportunity to provide leadership and innovation in environmental capacity-building for business service organizations (BSOs) that assist small and medium enterprises (SMEs).

Livestock Breeding: RCSA will support the multiplication of small ruminants (primarily goats) and poultry for use by resource-poor farmers. RCSA or its contractors/grantees must deliver a package of technologies to the farmer that addresses issues of sustainability and optimized management, so the farmer knows how to maximize livestock resources. The conditions described above regarding crop-livestock interventions need to be applied here as well.

2. Component 2: Marketing Support Services. Interventions include (1) Plant and Animal Health and Sanitation, (2) Market Linkages, (3) Agri-nutrition Pilots, (4) Markets and Seed Enterprise Development, and (5) ICT support for Interventions 1-4. Most aspects of these illustrative interventions will not directly affect the environment and are categorically excluded from additional environmental review on the basis of the following, to the extent that they do not involve activities directly affecting the environment (such as construction):

a. Categorical exclusions apply to: technical assistance and training in support of activities that will not directly affect the environment (216.2(c)(2)(i)), controlled experimentation for the purposes of research and field evaluation-except for biotechnology research (216.2(c)(2)(ii)), analyses, studies, and workshops (216.2(c)(2)(iii)), information transfers (216.2(c)(2)(v)), and studies, projects, or programs intended to develop the capability of recipient countries to engage in development planning (216.2(c)(2)(xiv)).

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b. Negative threshold decisions with conditions, per 22 CFR 216.3(a)(2)(iii), are recommended for: **Component 2**, intervention (1):

(i) Intervention (1), Plant and Animal Health & Sanitation

Conditions: To the extent that enhancing competitiveness in sectors such as fresh horticultural product marketing might invoke pesticide or other chemical use (safer use issues), or purchase of refrigeration units (avoid chlorofluorocarbon refrigerants), or enterprise expansion, and to the extent within the manageable interest of USAID/RCSA, it will be necessary to monitor for unintended downstream consequences of a wildly successful program (see Section 3) and address mitigation measures as apt, for example should USAID programs influence the marketing of pesticide products.

A key resource that should inform the SO team and its implementing partners in their design and implementation of these activities is the EGSSA, <http://www.encapafrica.org/SmallScaleGuidelines.htm>, e.g., Pesticides Safer Use chapter).

Animal Pathogen Detection.

Conditions: Should this program invoke quarantine infrastructure, handling and administration of veterinary drugs (vaccination) and resulting hazardous waste management issues, or possibly development of vaccines through GMO approaches, then appropriate measures should be taken to avoid or mitigate unintended environmental harm. Again the SO team and its implementing partners must consider in their design and implementation of the activities the apt section of the EGSSAA, <http://www.encapafrica.org/SmallScaleGuidelines.htm>.

Likewise, technology development and dissemination involving genetically modified vaccines should be subject to the appropriate USAID and host country review procedures. Prior to irreversible commitment of funds to activities potentially involving GMOs in research, field trials or dissemination, the appropriate USAID Biosafety Procedures will be addressed. Likewise, approval will be sought as appropriate from the cognizant national biosafety authority. See above discussion on GMOs.

3. Component 3: Disaster Management & Mitigation. Interventions include (1) bridging financial support and (2) capacity building for FEWSNET, which provides a vital early warning system for farmers in the Southern Africa region. This intervention will not directly affect the environment and is categorically excluded from additional environmental review on the basis of the following:

a. Categorical Exclusions apply to: education, technical assistance, and training (216.2(c)(2)(i)), analyses, studies, and workshops (216.2(c)(2)(iii)), information transfers (216.2(c)(2)(v)), contributions to international, regional, or national organizations which are not for the purpose of carrying out a specifically identifiable project (216.2(c)(2)(vi)), and programs intended to develop the capability of recipient countries to engage in development planning (216.2(c)(2)(xiv)).

4. Support for the PSO includes one intervention: HIV/AIDS education and nutrition programs. This intervention will not directly affect the environment and is categorically excluded from additional environmental review on the basis of the following:

Categorical Exclusions apply to: education, technical assistance, and training (216.2(c)(2)(i)), analyses, studies, and workshops (216.2(c)(2)(iii)), information transfers (216.2(c)(2)(v)), contributions to international, regional, or national organizations which are not for the purpose of carrying out a specifically identifiable project (216.2(c)(2)(vi)), and programs intended to develop the capability of recipient countries to engage in development planning (216.2(c)(2)(xiv)).

Potential Environmental Consequences at the Overall SO/Activity Level. As stated earlier, the RL Activity will provide opportunities for farmers and the agricultural support industry to increase incomes. This may provide incentives to increase the land area under agricultural production, placing

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increased pressure on sensitive habitats and marginal lands, resulting in land degradation, soil loss, and ground and surface water over-use and degradation. There may also be increased migration to areas that show promise for improved agricultural production and income generation potential. This could put pressure on natural resources, particularly woodlands, forests, water and power supplies.

These concerns are at the Activity level and should be considered, monitored, and mitigated for all activities supported by SO 15. The SO team will also ensure that provisions of the IEE concerning mitigation measures and the conditions specified herein along with the requirement to monitor be incorporated in all contracts, cooperative agreements, grants and subgrants.

In accordance with USAID ADS 204.5.4, the SO 15 team, with assistance from the MEO and REO, must actively monitor ongoing activities for compliance with approved IEE recommendations, and modify or end activities that are not in compliance. If there are any changes which affect the basis on which these threshold decisions were made, an IEE amendment will be prepared.

APPROVAL OF ENVIRONMENTAL ACTION RECOMMENDED:

CLEARANCE:

Mission Director: /cleared/ Date: 6/28/04
Dawn Thomas, Acting

CONCURRENCE:

Bureau Environmental

Officer: /cleared/ Date: 7/08/04
(Acting) Paul des Rosiers

Approved: X

Filename: _34RCSA4_SO15_Livelihoods.doc _ (USAID/AFR BEO) Disapproved: _____

ADDITIONAL CLEARANCES:

Mission Environmental

Officer (RCSA) /cleared/ Date: 6/23/04
Marcia Musisi-Nkambwe, Acting

Activity Manager: /cleared/ Date: 6/17/04
Jerry Brown, Acting

SO Team Leader: /cleared/ Date: 6/17/04
Jerry Brown

Senior Regional

Environmental Officer (REDSO): /Revised & Cleared/ Date: June 16, 2004
Walter Knausenberger

Environmental Analyst &

Policy Advisor (AFR/SD): _____ Date: _____
Brian Hirsch

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INITIAL ENVIRONMENTAL EXAMINATION

PROGRAM/ACTIVITY DATA:

Program/Activity Number: 690-0015
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1.0 BACKGROUND AND PROJECT DESCRIPTION

1.1 Purpose and Scope of IEE

The purpose of this Initial Environmental Examination (IEE) is to identify the reasonably foreseeable environmental effects of activities that will be conducted under the Rural Livelihoods (RL) Activity. The RL Activity will be RCSA's main vehicle for achieving the overall objectives of SO 15: to enhance food security in the region and provide export and other income-generating opportunities for farmers. The RL Activity comprises three components and 13 interventions. One additional intervention is included under the PSO. The components and interventions are summarized below. The Initiative to End Hunger in Africa (IEHA) and regional synergies and complementarities from effective coordination and monitoring of IEHA programs in Southern Africa span all components of the RL activity.

This IEE

- identifies activity components that may have environmental consequences;
- describes the illustrative interventions and applicable categorical exclusions;
- recommends additional environmental review and mitigation for certain interventions; and
- based on the extent of the intervention and impacts, recommends the applicable level of environmental review (ERR versus IEE versus EA) and level of approval (Mission Environmental Officer/Regional Environmental Advisor (MEO/REA) versus USAID/Washington Bureau Environmental Officer) that will be needed.

None of the interventions currently identified is expected to have significant effects on the environment, as defined in 216.2 (d)(1), and therefore it is unlikely that an EA will be required.

1.2 Background

Shortfalls in agricultural outputs result in food insecurity and limited potential to generate income through commercial agriculture. In response to this constraint, the RL Activity will help to improve rural livelihoods within the Southern Africa region by supporting activities that will boost productivity in the rural agriculture sector, make linkages between farmers and SME agri-processors, and identify export opportunities for both parties.

Problem Statement: The level of food insecurity in Southern Africa is high and rising. Farmers in this region face many constraints including

- over-dependence on maize, a high-risk crop in some areas;
- declining soil fertility;
- difficulty in obtaining inputs such as fertilizers and seeds;
- water shortages;
- limited knowledge of and access to productivity-enhancing technologies;
- lack of credit;
- inadequate or non-existent agricultural extension services;
- insufficient market information;
- weak market integration, impairing the transfer of food between markets; and
- poor linkages between producers and buyers.

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Proposed Solution: The RL Activity will address the issues listed above and contribute to the following SO 15 intermediate results (IRs):

- Exports by emerging commercial farmers of high-value agricultural commodities increased (IR 15.1);
- Agricultural production in pilot vulnerable communities diversified (IR 15.2); and
- Regional coordination on research and policy improved (IR 15.3).

See the Results Framework below.

1.3 Activity Components

Three activity components will be implemented to achieve the results listed above:

Component 1: Production Support Services. This component will support the production of high-value agricultural commodities for regional and international export markets, thereby increasing economic security for both farming and non-farming households. This component also will work with research institutions, associations and NGOs to identify constraints in the policy and regulatory environment to encourage policy harmonization and market-led adoption of new technologies. This component includes the following interventions:

- 1) Economic Research & Policy Harmonization
- 2) Biotechnology Research & Bio-safety Policy Advocacy
- 3) Research & Technology Transfer
- 4) Appropriate Germplasm
- 5) Information & Communications Technology (ICT) to support Component 1

The component will address the following IRs:

- 15.1.1 – Yield-enhancing technologies adopted by emerging commercial farmers
- 15.2.1 – Household-level productivity increased
- 15.2.2 – HIV/AIDS impact on agricultural production mitigated
- 15.2.3 – Household level enterprise development skills increased
- 15.3.2 – Joint public-private partnerships effectively advocated for agricultural trade and investment policy reform

Component 2: Market Support Services. This component will assist emerging commercial farmers to meet quality and safety standards of targeted regional and international export markets and facilitate commodity chain links in the region and abroad by forging strategic alliances with private sector partners. This component includes the following interventions:

- 1) Plant and Animal Health and Sanitation
- 2) Market Linkages
- 3) Agri-Nutrition Pilot Projects
- 4) Markets and Seed Enterprise Development
- 5) ICT to support Component 2

This component addresses the following sub-IRs:

- 15.1.2 – Emerging commercial farmers meet quality and safety standards for selected tradable agricultural commodities

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- 15.1.3 – Commodity chains link small scale commercial farmers, processors, and traders with export and regional markets
- 15.2.2 –HIV/AIDS impact on agricultural production mitigated
- 15.2.3 – Household level enterprise development skills increased
- 15.3.1 – Seed certification guidelines harmonized across the region
- 15.3.2 – Joint public-private partnerships effectively advocated for agricultural trade and investment policy reform
- 15.3.3 –Biosafety guidelines established

Component 3: Disaster Management & Mitigation. This component will work with regional institutions to strengthen capacity in forecasting stresses in the regional food supply and develop disaster mitigation strategies that will allow for a more rapid recovery of local economies. This component includes the following interventions:

1. Bridging financial support
2. Capacity building of FEWSNET

This component addresses IR:

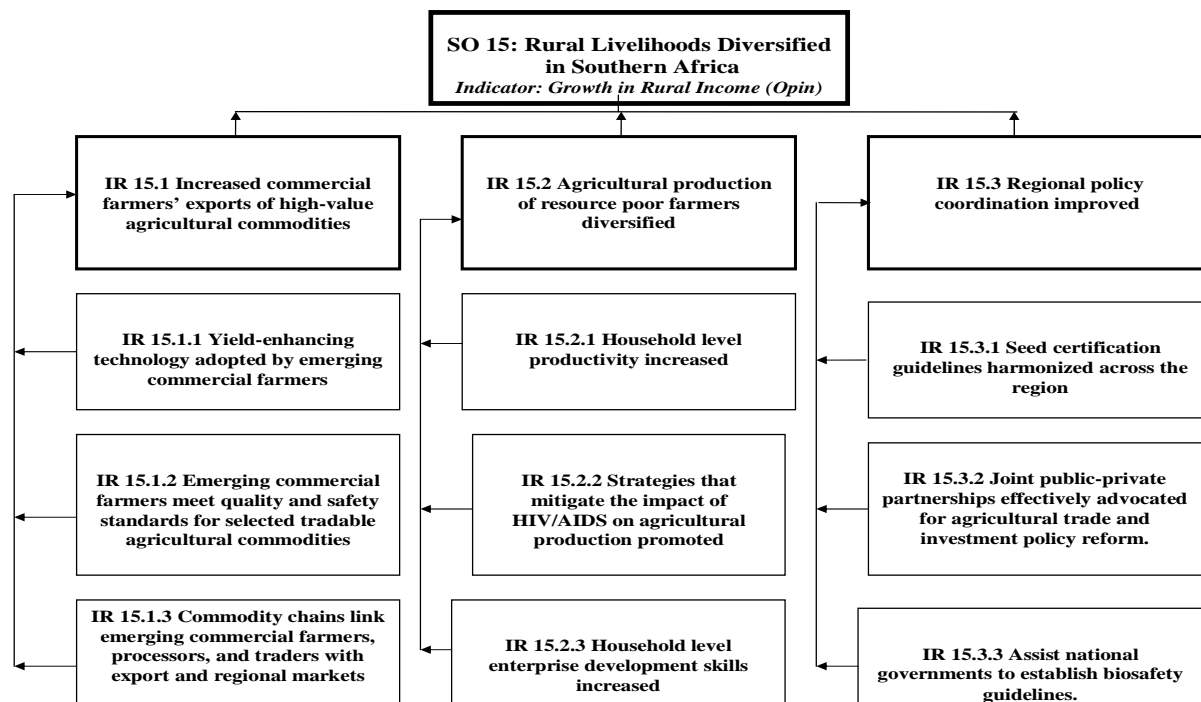
- 15.3 – Regional policy coordination improved

The RL Activity will fund support for one intervention under RCSA's PSO:

- HIV/AIDS education and nutrition

All components are linked to the IEHA, which is designed to build on regional synergies to enhance market-led agricultural growth in the region.

Results Framework for SO 15:



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2.0 COUNTRIES AND ENVIRONMENTAL INFORMATION (BASELINE INFORMATION)

Southern Africa faces long-term environmental threats. Land degradation and a decline in the productivity of cropland, pastures, and forests used in agriculture due to poor land management threaten food security and will increase poverty in certain "hot spots". In Southern Africa, soil, water, vegetation, landscape, and local climate conditions collectively influence land productivity. Damage to these resources decreases the ability to produce crops, grow trees, and support grazing cattle. Water erosion causes most degradation, while wind erosion is the major damage-causing factor affecting dry areas and cattle grazing lands. In many places, soils are losing nutrients and, where irrigation is mismanaged, are becoming salty. Loss of vegetation exposes soils to erosion and threatens habitat¹. In many African nations the poorest farmers live on land which is most susceptible to soil erosion. Often these lands are on steep slopes and clearing them for crop production causes the soil to rapidly erode. Major problems caused by land degradation include declining crop yields, sedimentation in rivers and streams, contamination of drinking water, health problems in people, and loss of habitat for animals.

2.1 Locations Affected

The RL Activity will be implemented in the Southern Africa region and may cover 11 countries.

The specific locations for technology transfer activities will be chosen early in the project implementation phase after contracts have been awarded. *Therefore, for site-specific physical interventions, additional environmental review (to include applicable national legislation) will be necessary once locations and specific projects are identified.*

2.2 National [or applicable] Environmental Policies and Procedures [of host country both for environmental assessment and pertaining to the sector]

The applicable procedures for countries within the region are limited. Available information is summarized in Table 1.

Table 1
National Environmental Policies and Procedures in Place in Southern African Countries

Country	Environmental Legislation &/or Policy	Level of Implementation
Angola	<ul style="list-style-type: none"> • Constitutional law (Article 12, No. 2 and Article 24. Nos. 1, 2, and 3) commits the State to correctly use of natural resources, guaranteeing sustainable development for all. • Law No. 5/98 of June 19 1998 defines the concepts and basic principles of environmental protection, preservation and conservation, promotion of improved quality of life and a rational use of natural resources. • Apart from this law (5/98), the Government of Angola (GoA) has committed itself to develop a National Program for Environmental Management, including all necessary structures and specialized organs, and creating the legislation that enables their enactment. • Since provision of portable water represents a major concern, the Angolan Ministry of Health committed itself to developing environmental regulations to control and monitor water and sanitary infrastructure incl. latrines. 	GoA has limited capacity to guide, monitor and evaluate development activities through environmental review procedures. GoA has recently committed itself to developing environmental regulations to control development activities, but the more detailed aspects of this initiative not likely to be available soon.
Botswana	Legislation on environment within certain Government Ministries and Departments. Over-arching environmental Policy lies with the National Conservation Strategy Agency (NCSA), the Draft Environmental Regulations have not yet	NCSA insists on, and reviews EIAs for all development projects, specific ministries also

¹ IFPRI

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Country	Environmental Legislation &/or Policy	Level of Implementation
	been passed by Government.	require EIA according to their own format(s).
Lesotho	Lesotho National Environmental Policy Reinforces regulations within the sectoral ministries	Applied to large-scale projects e.g., LHDA – Katse Dam Project
Malawi	Has a Dedicated Ministry and National Legislation and Guidelines on Environmental Impacts of Development Projects	Documents are reviewed, but levels of implementation are a bit haphazard due to lack of manpower
Mozambique	GRM's 1994 National Environment Management Program (NEMP) provides the framework for the development, adoption, and implementation of environmental policy measures in Mozambique. The legal framework has been updated, regulates access to natural resources, as well as the transfer of authority and decision-making to the local level. Other relevant laws: <ul style="list-style-type: none"> - Environmental Law (1997) promotes community participation in planning and decision-making related to the utilisation of natural resources; - Land Law (1997), - Forestry and Wildlife Law (1999) - Local Government Law (1998), - Decree 15/2000 on working relations between local government and traditional authorities (2000), - Pesticides and Fertilizer Regulations (2002) 	Application of the main ENRM laws is the responsibility of the Ministry for the Co-Ordination of Environmental Action (MICOA) and the Ministry of Agriculture and Rural Development (MADER).
Namibia	The Directorate of Environmental Affairs (DEA) is one of four directorates under the Ministry of Environment and Tourism	Legislation only in draft form, but policies in place and enforced
South Africa	White Paper on Environmental Management Policy for South Africa (1997) National Environmental Management Act (1998)	Comprehensive Legislation and follow-up
Swaziland	Swaziland Environment Action Plan, no policy proposals in place Urban Land and Environment Policy exists	Uncertain: TBD
Tanzania	National Environmental Management Act (NEMA): DRAFT Tanzania Environmental Protection Act Environmental Impact Assessment Procedures	Policy and/or Regulations are adhered to for project design. The extent of follow-up is uncertain
Zambia	Environmental Protection and Pollution Control Act Has a dedicated Ministry: Ministry of Environment & Natural Resources Regulations on: Air, Waste, Water and EIA	Regulations enforced by the Environmental Council of Zambia
Zimbabwe	Policy and the over-riding Natural Resources Act	Uncertain: TBD

In addition to national environmental legislation, most countries also have regulations and guidelines covering the conservation of forests, soils, water and watersheds, rangelands, health and sanitation, disaster management, and civil rights.

3.0 EVALUATION OF PROJECT/PROGRAM ISSUES WITH RESPECT TO ENVIRONMENTAL IMPACT POTENTIAL

Early Stage of Environmental Review

This IEE was conducted during the RL Activity planning and design phase. Until activities are clearly defined by the implementing partner(s), it is not possible to accurately identify the entire range of environmental effects. While at this stage, many interventions can be categorically excluded (216.2(c)(2)), certain interventions may have environmental effects. Negative threshold decisions (no significant adverse environmental effects if adequate mitigation actions are taken) are recommended for these interventions, and additional environmental review may be required once locations and specific activities are better defined during the work planning process.

Potential Environmental Consequences

Two of the three components include interventions some of which could raise environmental concerns. The third, Component 3, Disaster Management & Mitigation, raises no issues.

Component 1: Production Support Services.

Three of the five interventions have the potential for direct environmental harm if unmitigated: (2) Biotechnology Research & Bio-safety Policy Advocacy, (3) Research & Technology Transfer, and (4) Appropriate Germplasm. The ones that have no apparent environmental issues are (1) Economic Research & Policy Harmonization and (5) ICT.

The concerns regarding the potential impacts associated with these interventions are described below.

Intervention (2), Biotechnology Research & Bio-safety Policy Advocacy.

This intervention recognizes that the introduction of GMOs could result in environmental consequences and that without strict controls, including research and monitoring, introduced varieties could crossbreed with local crop varieties and change the nature of the local open-pollinated crop varieties. For this reason, this intervention seeks to establish a regulatory regime that will provide the proper protections for GMO testing. No GMO support, including testing and release, can occur without a host country biotechnology framework in place.

Intervention (3), Research & Technology Transfer.

This intervention will include hands-on field training to farmers and new, small-scale agri-input dealers (e.g., seeds, fertilizer) in crop production skills and agribusiness skills. The intervention will also help universities and other institutions to make their research more field-oriented and less isolated within the academic community. Concerns associated with this intervention include:

- Assistance in procuring or using fertilizers could adversely affect the environment if fertilizers are not applied properly or if they are used in areas that are home to threatened or endangered species or in other sensitive habitats, including protected areas and wetlands.
- Assistance in procuring or using pesticides could have environmental consequences. Concerns include effects on human health if pesticides are used, stored, and disposed of without appropriate safeguards. Inappropriate pesticide use, storage, and disposal may also contribute to ecosystem degradation, including adverse effects on water, wildlife, and land (agricultural, grazing, and natural areas).
- Diversification of crop-livestock systems could have adverse environmental effects if done on a large scale or in areas that are densely populated or not appropriate for agricultural development (forest, wetland, and other sensitive habitats). Farmers will be introduced to technology, production skills, crop improvement, irrigation, seeds, farm management and other related activities which will require best practices to be followed.

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- Assistance in constructing and managing irrigation systems could have environmental consequences, especially given the region's primarily arid and semi-arid conditions. Poorly designed irrigation schemes could increase soil salinity or cause other problems.
- Post-harvest storage and marketing, agricultural input manufacturing and distribution: This raises issues with the approaches taken to protect the commodities after harvest against disease and pest organisms, and the nature of the support to the manufacturing sector.

Intervention (4), Appropriate Germplasm.

- Seed sector development, R&D to identify genetic material that best meets the needs of the clients -- SME food processors, traders and exporters, working with research institutions and NGOs -- may include identifying seed material that matures earlier or later, has improved processing characteristics, improved post-harvest life traits, and/or improved consumer preference. This activity will support conventional crop research, to develop unique, novel traits in plant materials that improve profits of client farmers and SME's on this activity. The concern is that this could introduce exotic, inappropriate, or invasive species of plants or pests.
- Food processing of raw agricultural products: It is important for food manufacturers to maximize processing plant yields. To do this, they must use plant varieties that maximize processing efficiency. And they need to be concerned about process efficiencies and cleaner production technologies and pollution prevention.
- Livestock breeding: RCSA will support the multiplication of small ruminants (primarily goats) and poultry for use by resource-poor farmers. Implementers will also identify and demonstrate ways of better utilizing draft animals. Implementers will pay attention to the susceptibility of large ruminants to pathogens such as Rift Valley Fever and other potentially fatal pathogens present in specific geographies in Southern Africa. RCSA implementers will need to strengthen capacity of livestock owners in animal health and nutrition. A package of technologies must be delivered to the farmer so that the grant investment is protected and the farmer knows how to maximize livestock resources and the land the livestock grazes on.

Properly managed, livestock production can enhance land and water quality, biodiversity, and social and economic well-being. However, when improperly managed, livestock production may cause significant economic, social and environmental damage. As described in the [Livestock Production chapter](#) of the EGSSAA, the following types of environmental problems are often associated with livestock production: a) land degradation, b) habitat damage and reduced biodiversity, and c) harm to vegetation.

Component 2: Market Support Services.

One of the five intervention clusters may have the potential for direct environmental harm if unmitigated: (1) Plant and Animal Health and Sanitation (which includes Animal Pathogen Detection). These are expanded upon below.

The other interventions with no particular evident environmental issues are:

- (2) Market Linkages programs: farmers will be trained in specific crop/market quality requirements, cost structures, logistical systems, payment mechanisms, and other processes that are part of the international agribusiness trade complex. The intervention *will assist producers and agri-businesses to meet the price, quantity, safety, quality, fair trade and environmental requirements of specific markets.*
- (3) Agri-nutrition Business Pilot projects: this intervention will develop local SME businesses that will utilize this surplus production and develop formulations and manufacturing processes to transform the surplus crops into nutritional foods for infants, children, HIV/AIDS patients, and other at-risk groups.

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- (4) Market and Seed Enterprise Development: this intervention will provide firm level market strategy development training and provide 10 regional medium-size seed companies with marketing, networking and financial management skills; and
- (5) ICT.

The two interventions which have the potential for adverse environmental impacts are:

Intervention (1), Plant & Animal Health & Sanitation.

The RL Activity will also build capacity of farmers, traders, exporters and consultants in plant *phytosanitary* issues, including USDA/APHIS pest risk analysis (PRA), to understand and manage the complex phytosanitary regulatory environment of selected target markets. Particular emphasis will be placed on EU and Middle Eastern markets. Fresh horticultural products markets are particularly subject to global trading phytosanitary regulations and quality standards. Farmers, processors, packers and exporters must keep up with the changing regulatory environment in an effort to stay competitive. This activity will help RCSA's clients to remain competitive and will allow new players (small-scale commercial farmers and SMEs) to gain the knowledge necessary to enter into the global marketplace.

The environmental concerns relate to how the issue of pesticide residues are dealt with and whether USAID programs will influence the marketing of pesticide products.

Animal Pathogen Detection.

RCSA will build capacity in the region's *livestock pathogen detection*, monitoring and crisis management. The environmental concerns here relate mainly to technologies for improving early detection and containment of animal pathogens in the region. Pathogen management for diseases such as Food and Mouth Disease, Rift Valley Fever, and Bovine Tuberculosis could involve quarantine infrastructure, handling and administration of veterinary drugs (vaccination) and resulting hazardous waste management issues, possibly development of vaccines thorough GMO approaches.

These environmental consequences are used as the basis for recommending threshold decisions and conditions in section 4.

Potential environmental consequences at the overall SO/Activity level include:

- The RL Activity will provide opportunities for farmers and the agricultural support industry to increase incomes. This may increase the land area under agricultural production, placing increased pressure on sensitive habitats and marginal lands, resulting in land degradation, soil loss, and ground and surface water over-use and degradation.
- With the RL Activity providing support to the agricultural sector, there may be increased migration to areas that show promise for improved agricultural production and income generation potential. This could put pressure on natural resources, particularly woodlands, forests, water and power supplies.
- Promoting technologies if not appropriately managed could lead to risks to human and environmental health.

Farmers, processors, packers and exporters must keep up with the changing regulatory environment in an effort to stay competitive. This means being enabled to deal with global trading, phytosanitary regulations, quality, environmental and social (e.g., fair trade) standards. To the extent that enhancing competitiveness in sectors such as fresh horticultural product marketing might invoke pesticide or other chemical use (safer use issues), or purchase of refrigeration units (avoid chlorofluorocarbon refrigerants), or enterprise expansion, the following sorts of issues need to be addressed by the appropriate actors (not necessarily within the manageable interest of USAID/RCSA).

- *Location Decisions.* The location decisions of MSEs may have a profound impact on the environment. For example, an MSE's pollution and resource impacts, even if small, will be

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magnified if it operates in an ecologically sensitive area, in an area lacking proper or adequate waste treatment/disposal infrastructure, or in a place where other industries are already polluting. In addition, siting in an undeveloped area may require the construction of roads and other infrastructure that may have adverse secondary environmental impacts.

- *Procurement Decisions.* MSEs may be unaware of the availability and potential financial advantages of more efficient and greener inputs and production equipment. For example, brick-making MSEs may be able to use biological waste as a fuel instead of wood products.
- *Processing/Manufacturing Decisions.* For example, a common problem among MSEs is a lack of knowledge on the proper amount of chemical inputs to utilize in their processes (such as fabric dyes, fertilizers or pesticides). Insufficient knowledge frequently results in MSEs using significantly more inputs than necessary, increasing both their own costs and environmental risks.
- *Housekeeping Practices.* Where orderliness and cleanliness in MSEs is weak, increased waste/spillage of inputs and environmental contamination may occur unnecessarily.
- *Employee Safety/Health Decisions.* “The majority of the adverse environmental impacts caused by microenterprises are related to health, hygiene, and safety in industrial and agricultural enterprises. These impacts affect owners, their families, employees, and neighbors, and to avoid them it is sufficient to apply basic industrial safety standards or simple hygienic practices. The activities that are most detrimental to workers' health involve contact with toxic or corrosive substances such as heavy metals, acids, and organic solvents. The effects are often not immediately noticeable, and only become apparent in the medium or long term.” (Intermediate Technology Consultants 1997d)
- *Waste Disposal Decisions.* Improper disposal of waste byproducts may lead to unintentional toxic contact with community members and/or the contamination of water and air.

These potential environmental consequences should be factored into the proposal and work planning phases for the RL Activity design.

4.0 RECOMMENDED THRESHOLD DECISIONS & MITIGATION ACTIONS (INCLUDING MONITORING AND EVALUATION)

4.1 Recommended Threshold Decisions and Mitigation Actions (Including Monitoring and Evaluation)

The following is a description of possible illustrative interventions under each component and the applicable recommended threshold decisions.

Component 1 : Production Support Services. Interventions include (1) Economic Research & Policy Harmonization, (2) Biotechnology Research & Bio-safety Policy Advocacy, (3) Research & Technology Transfer, (4) Appropriate Germplasm, (5) ICT to support interventions 1-4. With the exceptions of (2) Biotechnology Research & Bio-safety Policy Advocacy, (3) Research & Technology Transfer, and aspects of (4) Appropriate Germplasm, the illustrative interventions included in Component 1 will not directly affect the environment and can be categorically excluded from additional environmental review on the basis of the following:

- **Categorical exclusions** are recommended for (a) education, technical assistance, training (216.2(c)(2)(i)), (b) analyses, studies, and workshops (216.2(c)(2)(iii)), (c) information transfers (216.2(c)(2)(v)), as well as (d) for studies, projects or programs intended to develop the capability of recipient countries and organizations to engage in development planning (22 CFR 216.2(c)(2)(xiv)).

Negative threshold decisions with conditions, per 22 CFR 216.3(a)(2)(iii), are recommended for: Intervention (2) Biotechnology Research & Bio-safety Policy Advocacy, (3) Research & Technology Transfer, and (4) Appropriate Germplasm. The conditions are laid out below.

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Intervention (2): Biotechnology Research and Bio-safety Policy Advocacy. Biotechnology research and bio-safety policy advocacy will be promoted with the condition that no biotechnology testing or release of any kind can take place until the host country has drafted and approved a regulatory framework governing biotechnology and bio-safety. This intervention includes assistance in the development of regulations on the testing and use of GMOs. Illustrative interventions will mainly involve technical assistance, training and workshops, studies and analyses. Any controlled experimentation for the purpose of research and field evaluation would be conducted in South Africa, which is the only country in the region that has an approved regulatory framework governing biotechnology and bio-safety. In addition, interventions that involve biotechnologies shall conform to the USAID Biosafety Review Procedures [ADS 211, in draft], which describes the required written approval procedures needed before transferring or releasing GE products to the field. The USAID Biosafety first review and reporting requirements are summarized below in [Sect. 4.3](#).

Intervention (3): Research & Technology Transfer. This intervention may include the following types of activities that could warrant additional environmental review, with the identified illustrative mitigation conditions:

Assistance in Procuring or Using Fertilizers with the condition that this support is confined to “small-scale” and is located where threatened or endangered species or their habitat, and other sensitive habitats, including protected areas and wetlands, will not be adversely impacted. In addition, this negative threshold decision is recommended based on the understanding that assistance in the use of fertilizers will not include support for the procurement of “quantity imports” of fertilizers. The implementing partner should also seek guidance on small-scale and quantity imports. It is recommended that fertilizers be thoughtfully employed according to best practice, promoting integrated soil fertility management, within the context of the prevailing biophysical and socio-economic conditions, as well as the desired outcomes. A key resource which should inform the SO and its implementing partners in their design and implementation of these activities is the EGSSAA, <http://www.encapafrika.org/SmallScaleGuidelines.htm>.

Assistance in Procuring or Using Pesticides, including their procurement, use, transport, storage or disposal, shall occur only under the following conditions:

- Any pesticide activity considered under this program would necessitate the preparation and approval of a Pesticide Evaluation Report and Safer Use Action Plan (PERSUAP), in accordance with AFR Bureau guidance and fulfilling all analytical elements required by 22CFR216.3(b), USAID’s Pesticide Procedures.
- Any assistance shall be limited to “small-scale” use and to pesticides registered with the USEPA for the same or similar uses without restriction.
- An amended IEE must be submitted to and approved by the Africa Bureau Environmental Officer prior to using or procuring pesticides (including TA and training in pesticide use and management).
- If the amended IEE indicates that the proposed pesticide use will significantly affect the human or natural environment, a positive threshold decision shall be recommended, and an EA shall be conducted.

Diversification of Crop-livestock Systems. The condition is that livestock systems are limited to the care, management and breeding of small ruminants and poultry and that this intervention only takes place at very low densities in rural areas. Animal populations per household should be insignificant in terms of density and possible issues with nitrate pollution from livestock. In addition, steps should be taken to ensure that land unsuitable for agriculture (forest, wetland, and other sensitive habitats) shall not be cleared to support crop or livestock diversification.

The SO team must work with implementing partners to assure that the livestock production activities are designed and implemented in such a way as to avoid potential harmful impacts as much as possible. The above EGSSAA chapter on [Livestock Production](#) should be used as a guide to this analysis. Of particular utility for such an analysis is the Livestock chapter’s table titled, *Mitigation and Monitoring Issues Environmental Mitigation and Monitoring Issues for Livestock Projects*. Implementing partners should monitor for and report on adverse impacts, particularly land and habitat degradation.

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Assistance in Constructing and Managing Irrigation Systems. While 22 CFR 216 does not provide guidance regarding what is considered small versus large-scale, an ERR [see EGSSAA, Part III (www.encapafrica.org/SmallScaleGuidelines/)] will be required, at a site and activity-specific level, that describes the intervention, potential environmental consequences, and recommends mitigation measures. At the discretion of the REA/MEO, a determination will be made of the scale of the intervention and the range and significance of impacts, and based on this analysis, whether additional environmental review will be necessary.

Intervention (4): Appropriate Germplasm.

Seed Sector Development, R&D to Identify Genetic Material. SME food processors, traders and exporters, supported research institutions, NGOs and suppliers shall: 1) ensure appropriateness for the agroclimatic zone to which they are being introduced; 2) avoid providing or promoting genetically modified organisms (GMOs); 3) avoid introducing exotic invasive species; and 4) avoid introduction of non-native plants into protected areas.

This requires identifying and mitigating any potential direct adverse impacts on the physical environment and human health and safety (such as due to aflatoxin contamination) arising from distribution of free seeds.

Food Processing of Raw Agricultural Products. Food manufacturers must use plant varieties that maximize processing efficiency, take measures as appropriate to ensure process efficiencies and cleaner production technologies and pollution prevention. It is recommended that for all activities relating to the expansion of microfinance and/or micro enterprise to be subjected to environmental review. The **ERR form** in the EGSSAA can be tailored as needed, to assist in identifying potential environmental impacts that are likely to occur as a result of such micro enterprise activities. The ERR helps to classify such potential impacts into low risk medium risk and high risk categories. Mitigation measures must be identified for all medium and high risk categories. Again, the USAID Bureau for Africa's EGSSAA, Part III, "Guidelines for Micro and Small enterprises." In addition, the SO team leader shall visit all such projects during implementation to ensure that they are not likely to cause any adverse environmental impacts, with a view to correcting and or initiating additional mitigation measures.

An environmental management course entitled "Improving Micro- and Small Enterprise Success through Cleaner Production" is recommended for SO 15 partners. See <http://www.encapafrica.org/coursepage.htm>. This provides an opportunity to provide leadership and innovation in environmental capacity-building for business service organizations (BSOs) that assist small and medium enterprises (SMEs).

Livestock Breeding: RCSA will support the multiplication of small ruminants (primarily goats) and poultry for use by resource-poor farmers. A package of technologies must be delivered to the farmer, addressing issues of sustainability and optimized management, so the farmer knows how to maximize livestock resources. The conditions described above regarding crop-livestock interventions need to be applied here as well.

Component 2: Marketing Support Services. Interventions include (1) Plant and Animal Health and Sanitation, (2) Market Linkages, (3) Agri-nutrition Pilots, (4) Markets and Seed Enterprise Development, and (5) ICT support for Interventions 1-4. Most aspects of these illustrative interventions will not directly affect the environment and are categorically excluded from additional environmental review on the basis of the following, to the extent that they do not involve activities directly affecting the environment (such as construction):

Categorical exclusions apply to: technical assistance and training in support of activities that will not directly affect the environment (216.2(c)(2)(i)), controlled experimentation for the purposes of research and field evaluation-except for biotechnology research (216.2(c)(2)(ii)), analyses, studies, and workshops (216.2(c)(2)(iii)), information transfers (216.2(c)(2)(v)), and studies, projects, or

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programs intended to develop the capability of recipient countries to engage in development planning (216.2(c)(2)(xiv)).

Negative threshold decisions with conditions, per 22 CFR 216.3(a)(2)(iii), are recommended for **Component 2** Intervention (1)

Intervention (1): Plant & Animal Health & Sanitation.

To the extent that enhancing competitiveness in sectors such as fresh horticultural product marketing might invoke pesticide or other chemical use (safer use issues), or purchase of refrigeration units (avoid chlorofluorocarbon refrigerants), or enterprise expansion, and to the extent within the manageable interest of USAID/REDSO, it will be necessary to monitor for unintended downstream consequences of a wildly successful program (see Section 3) and address mitigation measures as apt, for example should USAID programs influence the marketing of pesticide products.

A key resource which should inform the SO team and its implementing partners in their design and implementation of these activities is the *EGSSAA*, <http://www.encapafrica.org/SmallScaleGuidelines.htm>, e.g. Pesticides Safer Use chapter).

Animal Pathogen Detection.

Should this program invoke quarantine infrastructure, handling and administration of veterinary drugs (vaccination) and resulting hazardous waste management issues, or possibly development of vaccines thorough GMO approaches, then appropriate measures should be taken to avoid or mitigate unintended environmental harm. Again the SO team and its implementing partner s must consider in their design and implementation of the activities the apt section of the *EGSSAA*, <http://www.encapafrica.org/SmallScaleGuidelines.htm>.

Likewise, technology development and dissemination involving genetically modified vaccines should be subject to the appropriate USAID and host country review procedures. Prior to irreversible commitment of funds to activities potentially involving GMOs in research, field trials or dissemination, the appropriate USAID Biosafety Procedures will be addressed. Likewise, approval will be sought as appropriate from the cognizant national biosafety authority. See above discussion on GMOs.

Component 3: Disaster Management & Mitigation. Interventions include (1) bridging financial support and (2) capacity building for FEWSNET, which provides a vital early warning system for farmers in the Southern Africa region. This intervention will not directly affect the environment and is categorically excluded from additional environmental review on the basis of the following:

Categorical Exclusions apply to: education, technical assistance, and training (216.2(c)(2)(i)), analyses, studies, and workshops (216.2(c)(2)(iii)), information transfers (216.2(c)(2)(v)), contributions to international, regional, or national organizations which are not for the purpose of carrying out a specifically identifiable project (216.2(c)(2)(vi)), and programs intended to develop the capability of recipient countries to engage in development planning (216.2(c)(2)(xiv)).

Support for PSO includes one intervention: HIV/AIDS Education and Nutrition Programs. This intervention will not directly affect the environment and is categorically excluded from additional environmental review on the basis of the following:

Categorical Exclusions apply to: education, technical assistance, and training (216.2(c)(2)(i)), analyses, studies, and workshops (216.2(c)(2)(iii)), information transfers (216.2(c)(2)(v)), contributions to international, regional, or national organizations which are not for the purpose of carrying out a specifically identifiable project (216.2(c)(2)(vi)), and programs intended to develop the capability of recipient countries to engage in development planning (216.2(c)(2)(xiv)).

Potential Environmental Consequences at the Overall SO/Activity Level. As stated earlier, the RL Activity will provide opportunities for farmers and the agricultural support industry to increase

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incomes. This may provide incentives to increase the land area under agricultural production, placing increased pressure on sensitive habitats and marginal lands, resulting in land degradation, soil loss, and ground and surface water over-use and degradation. There may also be increased migration to areas that show promise for improved agricultural production and income generation potential. This could put pressure on natural resources, particularly woodlands, forests, water and power supplies.

These concerns are at the Activity level and should be considered, monitored, and mitigated for all activities supported by SO 15.

4.2 Mitigation, Monitoring and Evaluation

The following monitoring, evaluation and mitigation methods are proposed for the interventions subject to “negative threshold decision with conditions” specified in section 4.1

1) Biotechnology Research & Bio-safety Policy Advocacy, with the condition that no biotechnology testing or release of any kind until the host country has drafted and approved a regulatory framework governing biotechnology and bio-safety; and compliance with ADS 211 required.

Responsible Party: implementing partner under the direction of the CTO

Monitoring Method: Quarterly reports

Level of approval required: REA

Timing: Quarterly or as necessary

2) Assistance in procuring or using fertilizers, small-scale in areas with no sensitive habitats or threatened or endangered species; and no quantity imports of fertilizers.

Responsible Party: CTO

Monitoring method: Quarterly reports

Level of approval required: REA

Timing: Quarterly

3) Assistance in procuring or using pesticides, subject to compliance with USAID Pesticide Procedures (22 CFR 216.3) prior to assistance,

Responsible Party: CTO

Monitoring method: Quarterly reports and Pesticide IEEs

Level of approval required: BEO

Timing: as needed

4) Diversification of crop-livestock systems (land clearing is not occurring)

Responsible Party: CTO

Monitoring method: Quarterly reports and work plans

Level of approval required: REA

Timing: Measures developed during work plan process and tracked in quarterly reports

5) Assistance in constructing or managing irrigation systems. ERRs shall be conducted for each site-specific irrigation interventions.

Responsible Party: CTO

Monitoring Method: ERR

Level of approval required: REA

Timing: During work plan process

6) Overall SO/Activity level: Measures for addressing these concerns shall be addressed in proposals submitted for the RL Activity and specific mitigation measures shall be incorporated into work plan elements.

Responsible Party: REA

Monitoring Method: proposal and work plans

Level of approval required: REA

Timing: At proposal submission and during year 1 work plan

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Implementation of IEE conditions shall be described in RL Activity Quarterly Reports, and monitoring of the implementation of IEE conditions and their success shall be part of the RL Activity Performance Monitoring Plan and included in RCSA's Annual Report.

4.3 USAID Biosafety “First Review, Proposal and Reporting” Requirements²

USAID's “Biosafety Procedures for Genetic Engineering Research” are still in draft. Summarized here is ADS Section 211.3.1, regarding mandatory procedures for the transfer to, testing of, or use outside of contained facilities in developing countries of all GE products (e.g., plants, microorganisms, livestock vaccines, animals, or insects). Laboratory research involving GE products in both the U.S. and developing countries is covered under current USAID provisions referencing National Institutes of Health (NIH) guidelines. The mandatory procedures apply to:

- All USAID-funded transfers of GE products from the U.S. to developing countries for testing or use outside a contained facility;
- Testing of GE products in the developing country in which they were developed; and
- Transfer of GE products from one developing country to another.

USAID-funded GE-product development and implementation partners are prohibited from transferring or releasing GE products prior to obtaining the required written approval from USAID, as detailed in ADS 211.3.1. In addition, applicable national laws (e.g., biosafety, shipping/packaging, sanitary, or phytosanitary standards) must be adhered to.

Regarding the first review of initial transfer, testing, or use (ADS 211.3.1), the responsible actors (grantee/contractor, etc.), shall follow the USAID biosafety review process:

Proposal. The implementing parties must: provide a proposal containing required information on the proposed transfer, testing, or use that the grantee/contractor. The goes to the USAID Cognizant Technical Officer (CTO) or Strategic Objective (SO) Team, before supporting GE products for testing or use. , the grantee/contractor must submit a proposal for approval by USAID.

External Review for USAID. This proposal will be forwarded by the CTO to the USAID Biosafety Officer for external review. The Biosafety Officer will arrange for an external biosafety review of the proposal.

Certification of Host Country Approval. Documentation must be provided demonstrating approval by the host country authorities of the proposed transfer, testing, or use that the grantee/contractor must provide to the USAID CTO or SO Team. If the country has a national biosafety authority or focal point (e.g., as required by Parties to the Cartagena Protocol on Biosafety), the letter of approval must come from this designated authority.

These procedures in this section apply to the first transfer, testing, or use of a particular GE product under a particular set of conditions. Streamlined procedures for the subsequent transfer, testing, or use of the same GE product under the same set of conditions are stated in 211.3.2.

The grantee/contractor or host country collaborator must submit to the USAID CTO or SO Team a letter or letters from the relevant authority in the host country approving the transfer and/or release of the GE product, including any specific conditions imposed by the host country.

USAID will not grant approval of the transfer or testing in the absence of this letter or letters of approval.

² Condensed from the draft USAID Automated Directives System (ADS), Chapter 211 “Biosafety Procedures for Genetic Engineering Research” is not yet widely available. Summarized here is ADS Section 211.3.1